

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BOSTON SCIENTIFIC CORPORATION)	
and BOSTON SCIENTIFIC SCIMED, INC.,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 05-768 (SLR)
)	
CONOR MEDSYSTEMS, INC.,)	
)	
Defendant.)	

DECLARATION OF JEFF TILLACK IN SUPPORT OF CONOR'S MOTION TO STAY

MORRIS, NICHOLS, ARSHT & TUNNELL
Jack B. Blumenfeld (ID # 1014)
Roger D. Smith II (ID # 3778)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899-1347
(302) 658-9200
jblumenfeld@mnat.com

Attorneys for Conor Medsystems, Inc.

Of Counsel:

Matthew D. Powers
Jared Bobrow
WEIL, GOTSHAL & MANGES LLP
201 Redwood Shores Parkway
Redwood Shores, CA 94065
(650) 802-3000

Sherry M. Knowles
KING & SPALDING LLP
191 Peachtree Street
Atlanta, GA 30303
(404) 572-4600

Dated: January 3, 2006

I, Jeff Tillack, declare:

1. I am the Vice President of Operations for Conor Medsystems, Inc. ("Conor"), the defendant in this action. I have held this position since 2003. I make this declaration in support of Conor's motion to stay this action. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to them under oath if called as a witness.

2. As Vice President of Operations at Conor, my duties and responsibilities include supervision and management of the purchasing, engineering and manufacturing functions for the production of innovative vascular drug delivery technologies.

3. Conor is a medical device company with fewer than 200 employees worldwide. Conor's business involves the development of innovative vascular drug delivery technologies. Conor has developed a bare metal stent called the UniStar and a drug-eluting stent called the CoStar™ to treat coronary artery disease.

4. Conor has not commercialized the CoStar stent or the UniStar stent in the United States. To date, Conor has not received regulatory approval from the Food and Drug Administration ("FDA") to commercialize any stent in the United States.

5. Conor has supplied CoStar stents in the United States for a clinical trial. Through that trial, Conor is seeking regulatory approval from the FDA to commercialize the CoStar stent in the United States. Conor also has supplied CoStar stents to certain countries in Europe for clinical trials in those countries that, in turn, have been used to support the U.S. clinical trial.

6. Conor has sold CoStar stents outside the United States on a commercial basis in certain countries that do not require regulatory approval. Through September 30, 2005, total sales of such stents overseas amounted to less than \$1.4 million.

Executed on JANUARY 2, 2006, in Menlo Park, CA.

I declare under penalty of perjury that the foregoing is true and correct.



Jeffrey Tillack

CERTIFICATE OF SERVICE

I, Jack B. Blumenfeld, hereby certify that on January 3, 2006, I caused to be electronically filed with the Clerk of the Court Declaration of Jeff Tillack in Support of Conor's Motion to Stay using CM/ECF, which will send notification of such filing(s) to the following:

Josy W. Ingersoll
Young, Conaway, Stargatt & Taylor, LLP

and that I caused copies to be served upon the following in the manner indicated:

BY HAND

Josy W. Ingersoll
Young, Conaway, Stargatt & Taylor, LLP
1000 West Street, 17th Floor
Wilmington, DE 19899

BY FEDERAL EXPRESS

Peter J. Armenio
Kirkland & Ellis
Citigroup Center
153 East 53rd Street
New York, NY 10022

/s/ Jack B. Blumenfeld (#1014)
Morris, Nichols, Arsht & Tunnell
1201 N. Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jblumenfeld@mnat.com